

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

vs.

**AT&T SERVICES, INC., AT&T MOBILITY,
LLC AND AT&T CORP.,**

Defendants.

Civil Action No. 2:23-cv-00397

LEAD CASE

JURY TRIAL

HEADWATER RESEARCH LLC,

Plaintiff,

vs.

**AT&T SERVICES, INC., AT&T MOBILITY,
LLC AND AT&T CORP.,**

Defendants.

Civil Action No. 2:23-cv-00398

MEMBER CASE

JURY TRIAL

**DECLARATION OF CLARE CHURCHMAN IN SUPPORT OF
DEFENDANT’S MOTION TO FOCUS PATENT CLAIMS**

I, Clare Churchman, declare as follows:

I am an attorney with the law firm of McKool Smith PC (“McKool Smith”), counsel for Defendants AT&T Services, Inc., AT&T Mobility, LLC and AT&T Corp., (“AT&T”). I make this declaration in support of Defendants’ Motion to Focus Patent Claims. Unless otherwise stated, the matters contained in this declaration are of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.

1. Attached as **Exhibit 1** is a true and correct copy of Headwater’s Infringement Contentions Cover Document, dated November 20, 2023.

2. Attached as **Exhibit 2** is a true and correct copy of Exhibit A to Headwater's Infringement Contentions, an Infringement Chart for U.S. Patent No. 8,589,541.

3. Attached as **Exhibit 3** is a true and correct copy of correspondence from K. Davis dated December 18, 2023

4. Attached as **Exhibit 4** is a true and correct copy of a letter of correspondence from N. Mathews to M. Fenster, dated January 12, 2024.

5. Attached as **Exhibit 5** is a true and correct copy of correspondence from C. Churchman dated January 22, 2024.

6. Attached as **Exhibit 6** is a true and correct copy of correspondence from N. Mathews dated January 25, 2024.

7. Attached as **Exhibit 7** is a true and correct copy of correspondence from K. Davis dated February 2, 2024.

8. Attached as **Exhibit 8** is a true and correct copy of Headwater's Objections and Responses to AT&T's First Set of Interrogatories, dated February 12, 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 11, 2024 in Dallas, Texas.

/s/ Clare Churchman
Clare Churchman